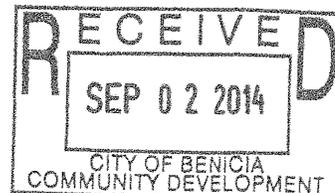


August 29, 2014

Amy Million, Principal Planner
Community Development Department
250 East L Street
Benicia, CA 94510
SENT VIA E-MAIL: amillion@ci.benicia.ca.us



RE: Valero Crude by Rail Project, Draft Environmental Impact Report

Ms. Million,

The Placer County Air Pollution Control District (PCAPCD) has reviewed the Draft Environmental Impact Report (DEIR) and associated air quality analyses prepared for the Valero Crude by Rail Project (Project). The Project proposes to build and operate an off-loading crude oil rail terminal at the Valero Refinery in the City of Benicia in order to receive up to 70,000 barrels per day of crude oil by train. The crude oil would be shipped by tank cars operated by the Union Pacific Railroad (UPRR), from various locations in North America to the Roseville Railyard in Placer County, to be assembled into a train for shipment into the Valero Refinery in the City of Benicia¹. The PCAPCD provides the following comments relating to the Project's air quality impacts for consideration.

Incomplete Analysis for Project-related Operational Emissions Occurring in Placer County and Northern California

In Section 4.1 "Air Quality", the DEIR estimates the operational emissions for criteria pollutants from the locomotives that would occur from two daily round-trips of 50-car trains traveling between the Roseville Railyard and the Valero Refinery. The portion of the operational emissions within the PCAPCD jurisdiction is calculated based on the assumption of 2.5 miles of railroad track length within Placer County and from the Roseville Yard activities². The DEIR, however, fails to include the emissions resulting from the Project-related locomotive trips for transport of the crude oil delivered from north or east of the County boundary line to the Roseville Railyard.

The DEIR explains that the analysis for the operational emissions is focused on the locomotive trips between the Roseville Railyard and the Refinery, and states "...there is no way to estimate with any certainty the net effect of the Project on areas outside of the Bay Area and Sacramento Basins because there is no way to predict the length of locomotive trips that could occur if the Project were approved, or the length of marine vessel trips that would occur if the Project were not approved"³. Yet in Section 4.6, "Greenhouse Gas Emissions", the DEIR states "... an average of the track length between the Roseville rail yard and the Nevada state line and the track length between the Roseville rail yard and the Oregon state line (approximately 195 miles of mainline track) was used, to estimate in-state GHG emissions from large line haul."⁴

Given that an estimated average track length between the state lines and the Roseville Railyard has been identified by the DEIR in the GHG emission analysis, the PCAPCD believes that the DEIR should identify the additional criteria pollutant emissions resulting from the Project-related locomotive trips delivering crude oil to the Roseville Railyard, as these trips would be associated with the approval of

1 DEIR, Project Description

2 DEIR, Table 4.1-6, page 4.1-20 and Appendix E.5 Air Quality and GHG Emission Supplement, page 3

3 DEIR, Discussion of Operation Outside the San Francisco and Sacramento Basin, page 4.1-21

4 DEIR, Section 4.6.3 Significance Criteria, under Analysis Methodology, page 4.6-9

the Project and result in reasonably foreseeable criteria pollutant emissions within Placer County⁵. Table 4.1-6 should be revised to include these additional criteria pollutant emissions within Placer County.

Additionally, the PCAPCD recommends that the DEIR also include the analysis within the Impact, 4.1-1b discussion, to determine if the Project-related operational emissions would result in a net increase for the other areas in Northern California. It should be noted that in addition to Placer, Sacramento, Solano, and Yolo Counties, there are many other counties within Northern California (including the portions of Sacramento Valley and Mountain Counties Air Basin) designated as nonattainment for the federal and state ozone standards^{6,7}. Since the DEIR has identified the track length between the Roseville Railyard and the Oregon and Nevada state line, the analysis should be able to determine the Project-related operational emissions occurring within each of the applicable air districts along the UPRR routes in Northern California. Table 4.1-6 should include the results and determine the associated air quality impacts with applicable CEQA thresholds in each air district.

Reconciliation of the No Project Alternative Conclusion

Section 6.4.1 of the DEIR states that the No Project Alternative would emit higher GHG emissions compared to the Project⁸. However, in Section 4.6, the DEIR indicates that the Project's Operational Emissions in California would have higher GHG emissions compared to the baseline emissions analysis⁹. The District recommends the DEIR reconcile the conflicting conclusions.

Disclosure of Related Information and Data in Appendices

The PCAPCD recommends citing the source for the emission factors used in Appendix E.2 and E.5 of the DEIR to estimate the marine vessel engine and locomotive emissions. In addition, the appendices should explicitly present all assumptions used within the calculations, such as the number of locomotives used for the delivery train. The City may consider consulting with the California Air Resources Board for data verification.

The PCAPCD appreciates the opportunity to comment on the DEIR prepared for the Valero Crude Oil Project. We would like to request future notification on the progress relating to the Project and request written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report.

If there are any questions regarding the comments made within, please do not hesitate to contact me at 530.745.2333 or agreen@placer.ca.gov.

Best Regards,



Angel Green
Associate Planner
Planning & Monitoring Section

cc: Yushuo Chang, Planning & Monitoring Section Supervisor

5 CEQA Guidelines Section 15378. PROJECT (a) "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

6 Area designation map for federal ozone standards http://www.arb.ca.gov/desig/adm/2013/fed_o3.pdf

7 Area designation map for state ozone standards http://www.arb.ca.gov/desig/adm/2013/state_o3.pdf

8 DEIR Section 6.4.1 No project Alternative discussion page 6-6

9 DEIR Section 4.6 Table 4.6-5 PROJECT ANNUAL NET GHG EMISSIONS GENERATED WITHIN CALIFORNIA